

## MONTHLY STATUS REPORT ON NESHAP AUDIT FINDINGS

### Finding 1 - Reconfiguration of Sampling Lines

**Status:** A plan for line replacement and/or modification for sampler locations 1 and 9 has been developed. The plan calls for reconfiguration of the sampling lines to eliminate all unnecessary bends with a projected completion date of February 1995 for location #1 and July 1995 for location #9.

Eight other sampler locations are within ANSI standards, three are in constrained spaces and one is under design review, making further reduction in bends unnecessary or unwise. This finding is thus considered closed for these locations.

### Finding 2 - Personnel Shortage

**Status:** A requisition (532-21) initiated January 31, 1994, for an additional person to the vent sampling group was not approved due to budgetary constraints. Until such time that funding is made available specifically to address this finding, further action to add staff is deferred indefinitely.

An off-site course comprising major elements from national training programs conducted by US EPA has been identified with August 19 - 20, 1994, as the date of the next session. The course includes EPA Method 5 stack sampling as well as air toxic analysis by US EPA methods. An effort to schedule two persons is planned.

To assure a training program for backup personnel is implemented to support primary personnel in vent sampling activities, four training modules for the vent sampling systems have been developed. These programs are in the review stage, and should be completed by August 1994.

### Findings 5 & 6 - Calibration Procedures and Calibration Tags

**Status:** Procedure TSD-532-004, Operational Procedures for the Continuous Vent Stack Samplers, has been revised to reflect more recently defined recalibration schedules, uniform protocols for systems where practical and consistency with other vent sampler operation procedures, such as TSD-532-015. Revisions are in the review stage and the scheduled date for issuance is May, 1994.

Stack flow measurement units at sampling locations 12, 13, 14, 15 and 16 are the most recent installations and employ an insertion type of mass flowmeter which was not adequately addressed in TSD-532-004 (formerly TSD-523-004). Calibration verification procedures for these units are being developed with an anticipated issue date of July, 1994.

### Finding 7 - X-333 BE and X-345 HASA Mass Flowmeter Calibration Protocol

**Status:** Calibration of the two mass flowmeters X-333 BE and X-345 HASA was completed on 3/30/93 and 3/31/93.

Procedure TSD-532-015, Calibration Schedule for Flow Measurement Devices of the Continuous Vent Stack Samplers, was issued May 15, 1993. This procedure specifies revised calibration schedules as noted under Findings 5 & 6 and is being reviewed to assure protocol consistency and interpretation with TSD-532-004 (formerly TSD-523-004). A completion date of May 1994 is anticipated.

Procedure TSD-532-004, Operational Procedures for the Continuous Vent Stack Samplers, is being revised to reflect the recalibration schedule detailed in TSD-532-015 and to ensure appropriate agreement, protocol consistency and interpretation with other operating procedures of the continuous bent stack samplers. Revisions are in the review stage and scheduled date for issuance is May, 1994.

3/30/94

STATUS OF NESHAP AUDIT FINDINGS

<u>Finding:</u>	<u>Scheduled completion</u>	<u>Date completed</u>
(1) Reconfiguration of sampling lines.	4/94	1 3/28/94
(2) Personnel shortage.	8/94	2 indefinite
(5) Calibration Procedures.	5/94	
(6) Calibration Tags.	7/94	
(7) X-333 BE & X-345 HASA Mass Flowmeter Calibration Protocol.	5/94	
(8) Marking and Identification Placement on Flowmeter Components.	1/94	1/28/94
(10, 12, & 13) Repeated High Background Entries in Maintenance Logbooks.	1/94	1/28/94
(16) Tri-Carb. Liquid Scintillation Counter Tracking Number.	1/94	1/28/94

1(Partial completion as noted in write-up).

2(Deferred indefinitely, pending funding)